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BEFORE THE ARIZONA CORPORATIO

2 BOB STUMP CHAIL

CHAIRMAN

GARY PIERCE

COMMISSIONER

BRENDA BURNS COMMISSIONER

BOB BURNS

COMMISSIONER SUSAN BITTER SMITH

COMMISSIONER

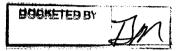
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IN THE MATTER OF ARIZONA PUBLIC

SERVICE COMPANY REQUEST FOR APPROVAL OF UPDATED GREEN POWER RATE SCHEDULE GPS-1, GPS-2, AND GPS-3.

IN THE MATTER OF THE APPLICATION OF ARIZONA PUBLIC SERVICE COMPANY FOR APPROVAL OF ITS 2013 RENEWABLE ENERGY STANDARD IMPLEMENTATION

ENERGY STANDARD IMPLEMENTATION FOR RESET OF RENEWABLE ENERGY ADJUSTOR.

IN THE MATTER OF THE APPLICATION OF TUCSON ELECTRIC POWER COMPANY FOR APPROVAL OF ITS 2013 RENEWABLE ENERGY STANDARD IMPLEMENTATION PLAN AND DISTRIBUTED ENERGY

PLAN AND DISTRIBUTED ENERGY ADMINISTRATIVE PLAN AND REQUEST FOR RESET OF ITS RENEWABLE ENERGY ADJUSTOR.

IN THE MATTER OF THE APPLICATION OF UNS ELECTRIC, INC. FOR APPROVAL OF ITS 2013 RENEWABLE ENERGY STANDARD IMPLEMENTATION PLAN AND DISTRIBUTED ENERGY ADMINISTRATIVE

PLAN AND REQUEST FOR RESET OF ITS RENEWABLE ENERGY ADJUSTOR.

Docket No. E-01345A-10-0394

Docket No. E-01345A-12-0290

Docket No. E-01933A-12-0296

Docket No. E-04204A-12-0297

RUCO'S NOTICE OF FILING

The RESIDENTIAL UTILITY CONSUMER OFFICE ("RUCO") hereby provides notice of

filing the Testimony Summary of Lon Huber, in the above-referenced matter.

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1	RESPECTFULLY SUBMITTED thi
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8	AN ORIGINAL AND THIRTEEN COPIES
9	of the foregoing filed this 31st day of May 2013 with:
10	
11	Docket Control Arizona Corporation Commission
12	1200 West Washington Phoenix, Arizona 85007
13	COPIES of the foregoing hand delivered/ mailed this 31st day of May, 2013 to:
14	
15	Teena Jibilian Administrative Law Judge Hearing Division
16	Arizona Corporation Commission 1200 West Washington
17	Phoenix, Arizona 85007
18	Janice Alward, Chief Counsel
19	Legal Division Arizona Corporation Commission
20	1200 West Washington Phoenix, Arizona 85007
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> E-01345A-10-0394 E-01345A-12-0290 E-01933A-12-0296 E-04204A-12-0297

SUMMARY OF THE TESTIMONY OF LON HUBER ON BEHALF OF THE RESIDENTIAL UTILITY CONSUMER OFFICE

The following is a summary of the direct, rebuttal and surrebuttal testimony of Residential Utility Consumer Office ("RUCO") witness Lon Huber, which presents RUCO's recommendations regarding renewable energy credit ("REC") transfer and compliance accounting mechanisms for Arizona's renewable energy standard.

RUCO's position is to allow a short window of time for the renewable energy credit ("REC") transfer issue to work itself out within the context of the broader distributed generation ("DG") cost/benefit discussion. This DG valuation matter is not some unknown future policy discussion; rather, it is imminent issue that will be addressed. APS has indicated their intent to submit a policy proposal in July and the Commission has made moves to create a separate docket/hearing for the subject. If the process does not come to a conclusion within a reasonable timeframe (one year) then RUCO recommends the adoption of a 50/50 REC split, with an exception for specific commercial customers. This would be a bridge to a more permanent solution. Although far from elegant, this solution

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SUMMARY OF THE TESTIMONY OF LON HUBER (Cont.)

affords every party a key piece of what they are seeking. Moreover, Arizona's major utilities are in compliance for years in advance, particularly for commercial.

Alternatively, RUCO would be pleased to support Staff's "Track and Monitor" if it were to be amended to protect REC integrity as specified in RUCO's Surrebuttal Testimony. Multiple parties, including RUCO and the nation's leading REC certifier, Center for Resource Solutions/Green-e, concur that Staff's proposal would violate the property rights of system owners. The modification to Staff's proposal as outlined by RUCO would enable Arizona to gauge market self-sufficiently each year while also maintaining REC integrity. Furthermore, it would avoid a burdensome rule change and shield ratepayers from unwarranted expenditures.